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Nevada Bar No. 004975  
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6 [mdushoff@klnevada.com](mailto:mdushoff@klnevada.com)

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8 Attorneys for Third-Party Garnishee  
ROSENDIN ELECTRIC, INC.

9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 \* \* \*

13 TRUSTEES OF THE CONSTRUCTION  
14 INDUSTRY AND LABORERS HEALTH  
AND WELFARE TRUST; TRUSTEES OF  
15 THE CONSTRUCTION INDUSTRY AND  
LABORERS JOINT PENSION TRUST;  
16 TRUSTEES OF THE CONSTRUCTION  
INDUSTRY AND LABORERS VACATION  
TRUST; AND TRUSTEES OF THE  
17 SOUTHERN NEVADA LABORERS LOCAL  
872 TRAINING TRUST,

18 Plaintiffs,

19 vs.

20 JR CONCRETE CUTTING, INC., a Nevada  
corporation; and EDITH RICHELLE  
21 HERRERA, an individual,

22 Defendants.  
23

CASE NO. 2:09-cv-01897-RDJ-RJJ

**NOTICE OF SERVICE OF  
ROSENDIN ELECTRIC, INC.'S  
RESPONSES TO PLAINTIFFS'  
GARNISHMENT  
INTERROGATORIES**

24 Third-Party Garnishee, ROSENDIN ELECTRIC, INC. ("Rosendin"), by and through its  
25 counsel of record Georlen K. Spangler, Esq. of the law firm Kolesar & Leatham, hereby files this  
26 notice of service of Rosendin's two (2) responses to the Garnishment Interrogatories, pursuant to

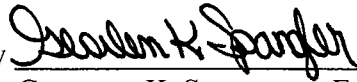
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1 this Court's Order [Dkt. 43] entered on July 12, 2013. A copy of Rosendin's responses are  
2 attached hereto as Exhibit 1.

3 DATED this 15<sup>th</sup> day of July, 2013.

4 **KOLESAR & LEATHAM**

5  
6 By 

7 GEORLEN K. SPANGLER, ESQ.

8 Nevada Bar No. 003818

9 MATTHEW T. DUSHOFF, ESQ.

10 Nevada Bar No. 004975

11 400 South Rampart Boulevard, Suite 400

12 Las Vegas, Nevada 89145

13 Attorneys for

14 ROSENDIN ELECTRIC, INC.

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KOLE SAR & LEATHAM  
400 S. Rampart Blvd., Ste. 400  
Las Vegas, Nevada 89145  
Tel: (702) 362-7800 / Fax: (702) 362-9472

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Kolesar & Leatham and that on the 15<sup>th</sup> day of July, 2013 I caused to be served a true and correct copy of foregoing **NOTICE OF SERVICE OF ROSENDIN ELECTRIC, INC.'S RESPONSES TO PLAINTIFFS' GARNISHMENT INTERROGATORIES** in the following manner:

(UNITED STATES MAIL) By depositing a copy of the above-referenced document and both original Garnishment Interrogatory Answers for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed below at their last-known mailing addresses, on the date above written:

Adam P. Segal  
Bryce C. Loveland, Esq.  
Ryan C. Curtis, Esq.  
Brownstein Hyatt Farber Schreck, LLP  
100 City Parkway, Suite 1600  
Las Vegas, NV 89106-4614

(ELECTRONIC SERVICE) Pursuant to Rule 5(D) of the Nevada Rules of Civil Procedure, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

Adam P. Segal [asegal@bhfs.com](mailto:asegal@bhfs.com), [chumes@bhfs.com](mailto:chumes@bhfs.com), [cneely@bhfs.com](mailto:cneely@bhfs.com),  
[edavis@bhfs.com](mailto:edavis@bhfs.com), [jcasper@bhfs.com](mailto:jcasper@bhfs.com), [let@bhfs.com](mailto:let@bhfs.com), [rcurtis@bhfs.com](mailto:rcurtis@bhfs.com)

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An Employee of KOLESAR & LEATHAM

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EXHIBIT 1

**INTERROGATORIES**

[To be answered under oath within twenty (20) days from date of service]

1) Are you in any manner indebted to JR Concrete Cutting, Inc. ("JR Concrete") either in property or money, and is the debt now due? If not due, when is the debt to become due? State fully all particulars.

ANSWER: No we are not

2) Are you an employer of JR Concrete? If so, state the length of your pay period and the amount JR Concrete currently earns during a pay period.

ANSWER: No we are not

3) Did you have in your possession, in your charge, or under your control, on the date the writ of garnishment was served upon you, any money, property, effects, goods, chattels, rights, credits or choses in action of JR Concrete, or in which JR Concrete is interested? If so, state its value, and state fully all particulars.

ANSWER: No we did not

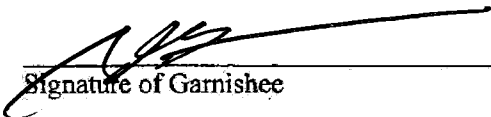
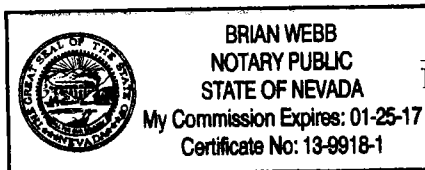
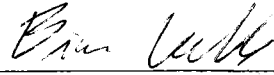
4) Do you know of any debts owing to JR Concrete, whether due or not due, or any money, property, effects, goods, chattels, rights, credits or choses in action, belonging to JR Concrete or in which JR Concrete is interested, and now in possession of or under the control of others? If so, state fully all of the particulars.

ANSWER: Retention for McCarran T-3 \$18,360.80

5) State your correct name and address, or the name and address of your attorney upon whom written notice of further proceedings in this action may be served.

ANSWER: Georlen Spangler, ESQ Kolesor & Leatham, Chtd  
400 S. Rampart Blvd. Suite 400 Las Vegas, NV 89145**GARNISHEE**

I, Steve Braverman, on behalf of Rosendin, do solemnly swear or affirm that the answers to the foregoing interrogatories by me subscribed are true.

  
Signature of Garnishee
SUBSCRIBED AND SWORN to before me this 21 day of June, 2013.
  
NOTARY PUBLIC in and for said County and State

**INTERROGATORIES**

[To be answered under oath within twenty (20) days from date of service]

1) Are you in any manner indebted to JR Concrete Cutting, Inc. ("JR Concrete") either in property or money, and is the debt now due? If not due, when is the debt to become due? State fully all particulars.

ANSWER: Yes

2) Are you an employer of JR Concrete? If so, state the length of your pay period and the amount JR Concrete currently earns during a pay period.

ANSWER: NO

3) Did you have in your possession, in your charge, or under your control, on the date the writ of garnishment was served upon you, any money, property, effects, goods, chattels, rights, credits or choses in action of JR Concrete, or in which JR Concrete is interested? If so, state its value, and state fully all particulars.

ANSWER: YES \$18,360.80 Retention fee McCarran T-3

4) Do you know of any debts owing to JR Concrete, whether due or not due, or any money, property, effects, goods, chattels, rights, credits or choses in action, belonging to JR Concrete or in which JR Concrete is interested, and now in possession of or under the control of others? If so, state fully all of the particulars.

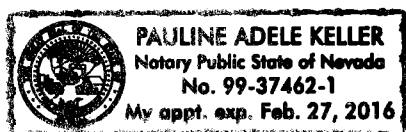
ANSWER: NO

5) State your correct name and address, or the name and address of your attorney upon whom written notice of further proceedings in this action may be served.

ANSWER: GENZEN K. Spangler, Esq., Kolesar & Leatham,  
400 S. Rampart Blvd., # 400, Las Vegas, NV 89145  
702/362-7800**GARNISHEE**

I, Steve Braveeman on behalf of Rosendin, do solemnly swear or affirm that the answers to the foregoing interrogatories by me subscribed are true.

Signature of Garnishee

SUBSCRIBED AND SWORN to before me this 9th day of July, 2013.

NOTARY PUBLIC in and for said County and State